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August 1, 2017

VIA ELECTRONIC DELIVERY

Florida Public Service Commission Office of Commission Clerk 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 (850) 413-6770

> Re: Docket No. 170146-TX Responses to Data Requests

To Whom It May Concern:

Attached please find for filing a public version of Global Connection Inc. of America d/b/a Stand Up Wireless' responses to Data Requests issued in the above-referenced docket, including applicant certification. The confidential version will be sent via overnight delivery.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

s/Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Global Connection Inc. of America
d/b/a STAND UP WIRELESS

Attachments

cc: cbeard@psc.state.fl.us

RESPONSES TO DATA REQUEST FOR GLOBAL CONNECTION INC. OF AMERICA D/B/A STAND UP WIRELESS

1. Will Global Connection Inc. of America d/b/a Stand Up Wireless (Global) continue to provide wireline only Lifeline service in Florida?

Response: The proposed transfer of control will not affect Global's provision of services. Global will continue to meet the requirements of its ETC designation, and at this time will continue to provide wireline only Lifeline service in Florida. Global does have an application pending with the FCC to transfer its existing wireline subscribers to Tele Circuit Network Corporation; however, Global still intends to utilize its ETC designation in Florida even after the proposed transfer.

2. Does Global have any plans to offer wireless Lifeline services in Florida?

Response: Global has an ETC application pending with the FCC for the authority to offer wireless Lifeline services in Florida.

3. How many Lifeline customers does Global presently serve in Florida?

Response: Global serves 95 wireline Lifeline customers in Florida as of June 31, 2017.

4. How many of Global's Lifeline customers are paying via a prepaid service?

Response: All of Global's Lifeline customers are paying via a prepaid service.

5. Please provide examples of a Global residential bill as well as a Lifeline customer bill.

Response: See attached Exhibit A.

6. Is Global still providing wireline Lifeline service in all of the AT&T wire centers that were approved by this Commission?

Response: Yes.

7. Does Global have any outstanding Lifeline or other complaints at any state commission or at the Federal Communications Commission (FCC)? If so, please provide detailed documentation of any complaint filed with a state commission or at the FCC in the past three years.

Response: Global has a pending complaint with the NC state commission and the FCC. Global respectfully requests an extension of time to provide the requested documentation and will supplement this response as soon as possible.

8. Please provide examples of Global's advertising which show the use of media of general distribution, the availability of the supported services and the charges for these services.

Response: See attached Exhibit B.

9. Are Global's Lifeline advertisements available in languages other than English? If so, which languages?

Response: Global's Lifeline advertisements are also available in Spanish.

10. Please list the states that Global currently operates in and the states Global provides Lifeline assistance.

Response: Global currently provides prepaid <u>wireline</u> local exchange and long distance services in Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Missouri, Mississippi, North Carolina, Ohio, Oklahoma, South Carolina, Tennessee, Texas, and Wisconsin.

Global currently provides prepaid <u>wireless</u> telecommunications services under its d/b/a, Stand Up Wireless, in twenty-four (24) jurisdictions: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia.

Global provides <u>wireline</u> Lifeline services in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas, and provides <u>wireless</u> Lifeline services in each of the 24 wireless jurisdictions listed above.

11. In each of the states listed above, please indicate if Global is providing services as: 1) a wireline company or 2) a wireless company and whether it was designated by the state commission or the FCC.

Response: Global, as a company, provides both wireline and wireless services. There are certain states in which Global provides both wireline and wireless services (see response to No. 10 above); however, Global's provision of wireless services is under its d/b/a StandUP Wireless. All of Global's telecommunications licenses to date, including ETC designations, have been granted by the state commissions.

12. List all pending wireline eligible telecommunications carrier (ETC) petitions, with docket numbers and the state in which the designation is being requested.

Response: Global does not have any pending wireline ETC petitions.

13. List all pending ETC petitions, with docket numbers, currently pending at the FCC.

Response: See Petition of Global Connection Inc. of America. For Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia, filed April 4, 2012, and subsequently amended on February 26, 2013, in WC Docket No. 09-197.

14. Has Global filed for ETC status in any state and subsequently withdrawn the petition or been denied? If so, please list those states and docket numbers.

Response: Global has not been denied ETC status in any jurisdiction. Global (d/b/a Stand Up Wireless) has withdrawn, without prejudice, its application for wireless ETC designation in the following states, in many cases due to FCC rule changes and passage of time which made the information stale: Idaho (GLO-T-13-01), Indiana (41052-ETC 71), Illinois (11-0579), Mississippi (13-UA-259), New Jersey (TO 11100621), Oregon (UM 1545) and Washington (UT-110992); Global has since refiled its wireless ETC applications in New Jersey and Washington. Global has withdrawn requests for wireline ETC designation in Illinois (07-0323 and 09-0586). It is possible that Global withdrew other wireline ETC applications in the past, prior to current management's knowledge; to the extent Global becomes aware of such withdrawals, Global will supplement this response as soon as possible.

15. Are there states where Global is eligible, receiving, or seeking High-Cost support from the federal universal service fund (USF)? Please explain and list docket numbers where applicable.

Response: No, Global has not requested and does not seek or receive high-cost support.

16. With the new owner, has management or officers of Global changed? If no, do you anticipate such changes?

Response: The proposed change in ownership is pending before the FCC and has not been consummated. David Skogen is no longer the CEO of Global; there have been no other changes in management or officers, and the only anticipated change would be an appointment to the CEO position.

17. Have any owners, officers, or managers of Global been involved in any bankruptcy proceedings? If so, please provide details as to whom, when, and where the bankruptcy occurred.

Response: No.

18. Have any owners, officers, or managers of Global been charged or convicted of a criminal offense? If so, please provide details as to whom, when, and where the charges or convictions occurred.

Response: No.

19. Please identify any civil litigation in which a Global owner, officer, or manager has been deposed or has been a plaintiff, a defendant, or a witness.

Response: None.

20. Does Global use sub-contractors (operations, call centers, etc.) to provide the required services? If so, provide the name of each company and physical address.

Response: Yes. Global outsources Call Centers to:

Vcare Corporation, based in NJ (1101 N. Kings Highway, Suite - 201, Cherry Hill, NJ 08034), and

Tele Circuit Network Corporation, based in GA (1815 Satellite Blvd., Suite 504, Duluth, Georgia 30097).

21. Has Global been audited by any state or federal agencies regarding Lifeline? If so, list the state(s) and the result of the audit(s).

Response:

USAC 2013 Biennial Audit for MO, GA and MI. No Findings. USAC 2015 Biennial Audit for GA, MI and WI. No Findings.

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

22. For each state where Global is an ETC please identify how much support Global has received from the federal USF to date.

Response: See attached Exhibit C, which includes data publicly-available on USAC's site.

23. Does Global understand that there may be an audit by the Florida Public Service Commission regarding USF?

Response: Yes.

24. Does Global maintain separate books/general ledgers for each state that it operates in? Where are the books/general ledgers maintained?

Response: Books/general ledgers are maintained at Global's principal office located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Global does not maintain separate books or general ledgers for states.

25. Please provide a listing of the current prices and service offerings available to Global Lifeline customers. Will the plans be changing with the new owner?

Response: Global's wireline offerings are advertised on its wireline website, http://www.connectwithglobal.com/home_services.html. Global does not currently provide wireless Lifeline services in Florida, but those plans are maintained at https://www.standupwireless.com/. Global's plans may change, irrespective of the new owner, due to changes in regulations and/or market competition.

26. Has Global received requests for service from potential Lifeline customers that were unfulfilled in the previous calendar year? If so, how many?

Response: To the best of Global's knowledge, Global did not have any unfulfilled service requests from qualified Lifeline customers in the previous calendar year.

27. Are customers who reconnect service with the company required to pay the past due bill and a reconnection fee prior to receiving service? Are Lifeline customers allowed to pay past due amounts over time? Are Lifeline customers charged a reconnection fee?

Response: All customers, including Lifeline, are charged a reconnection fee. Customers are required to pay past due balances before reconnection. However, reconnection fees can be paid over time.

28. Please provide the name of the person and/or entity which will be filing the Form 497 with USAC if Global maintains its ETC status in Florida.

Response: The Form 497 will continue to be filed by CGM, LLC, in conjunction with Global's CFO (Edward Smith).

29. Please provide a description of Global's corporate structure, with both names and titles. Please provide a list of Global's owners or corporate officers and indicate if any are also owners, corporate officers or employees of any other telecommunications companies.

Response: See attached Exhibit D. A list of Global's current owners was provided in Exhibit A to the Joint Petition for Approval of Transfer of Control.

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

EXHIBIT A

SAMPLE BILLS



Global Connection Inc. of America

P.O. BOX 1527 Norcross, GA 30091

Invoice

Account No.	invoice No.	06/20/17	07/13/17
Account No.	Invoice No.	Invoice Date	Due Date

Total Amount Due if paid by 07/13/17

35.15

06/29/17

07/13/17

35.15 -35.15

0.00

38.45

14.45

-15.75

-2.00 35.15 **35.15**

-35.15

-35.15

-2.00

-9.25

-3.50

-3.00

-17.75

Amount

38.45

0.00

0.00

0.00 38.45

0.85

0.40

0.73

0.11

0.91

4.95

6.50

Reconnection & Restoral fees apply if service is disconnected or suspended for non-payment.

Amount Paid	



Check here to change address and make changes in the space available below.



Contact us to request a payment arrangement at 1-877-519-8557.

Thank you for your most recent payment. We appreciate your business and value you as a customer. To prevent interruption of your home telephone service and potential loss of your phone number, please ensure we receive your payment on or before your Due Date shown above.

If you need to make payment arrangements or have questions concerning your account, please contact our Customer Care Center at 1-877-511-3009.

CUSTOMER SERVICE CONTACT INFO BY PHONE BYEMAIL BY MAIL CUSTOMER **EMAIL US MAIL** SUPPORT SERVICE HOURS Email us at: We may be reached at: Support@RealH naPhona.com Global Connection Inc. 1-877-511-3009 to receive prompt PO Box 1527 Norcross, GA 30091 M-F 8:30am and courteous to 6:00 pm EST inquiry or issue.





Global charges an extra fee for every call to 411. Don't pay for information.

Dial 1-800-FREE411 from your home phone to avoid being charged for the call.

REFER A FRIEND or FAMILY MEMBER

Call Global Connection Customer Service for details

Account Summary		
Account Number		
Telephone Number		
Customer Name		
Invoice Date		
Invoice No.		
Due Date		
Activity Summary		
Previous Balance		***************************************
Payments Received - Thank you!		
Balance Forward		
New Charges		
Recurring Charges		
Taxes and Surcharges		
Discounts		
Adjustments		
Total New Charges		
Total Due		
Total Due	cess on 7	/13/201
Total Due Your automatic payment will pro	cess on 7	/13/201
Total Due Your automatic payment will pro	cess on 7	/13/201
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you!	cess on 7	-35.1
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits		
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you!		-35.1
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC)	6/13/17	-35.15 -35.15 -2.0 -9.2
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global)	6/13/17 6/29/17 7/19/17 7/19/17	-35.15 -35.15 -2.0 -9.2 -3.5
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - \$3 off indefinitely	6/13/17 6/29/17 7/19/17	-35.15 -35.15 -2.0 -9.2 -3.5 -3.0
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - \$3 off indefinitely	6/13/17 6/29/17 7/19/17 7/19/17	-35.15 -35.15 -2.0 -9.2 -3.5
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global)	6/13/17 6/29/17 7/19/17 7/19/17	-35.15 -35.15 -2.0 -9.2 -3.5 -3.0
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - \$3 off indefinitely Subtotal Recurring Charges Recurring Charges	6/13/17 6/29/17 7/19/17 7/19/17 7/19/17	-35.15 -35.15 -2.0 -9.2 -3.5 -3.0
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - \$3 off indefinitely Subtotal Recurring Charges Recurring Charges for:Number:	6/13/17 6/29/17 7/19/17 7/19/17 7/19/17 Period	-35.15 -35.15 -2.0 -9.2 -3.5 -3.0 -17.75
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - \$3 off indefinitely Subtotal Recurring Charges Recurring Charges Recurring Charges for:Number: Description Advantage Lifeline - 3423 - AB	6/13/17 6/29/17 7/19/17 7/19/17 7/19/17 Period 7/19/17	-35.15 -2.0 -9.2 -3.5 -3.0 -17.75
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - \$3 off indefinitely Subtotal Recurring Charges Recurring Charges Recurring Charges for:Number: Description Advantage Lifeline - 3423 - AB Call Waiting	6/13/17 6/29/17 7/19/17 7/19/17 7/19/17 Period 7/19/17 7/19/17	-35.15 -2.0 -9.2 -3.5-3.0 -17.75
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - \$3 off indefinitely Subtotal Recurring Charges Recurring Charges Recurring Charges for:Number: Description Advantage Lifeline - 3423 - AB Call Waiting Caller ID	6/29/17 7/19/17 7/19/17 7/19/17 7/19/17 7/19/17 7/19/17	-35.15 -2.0 -9.2 -3.5 -3.0 -17.75 to 8/18/17 to 8/18/17 to 8/18/17
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - \$3 off indefinitely Subtotal Recurring Charges Recurring Charges Recurring Charges for:Number: Description Advantage Lifeline - 3423 - AB Call Waiting	6/29/17 7/19/17 7/19/17 7/19/17 7/19/17 7/19/17 7/19/17	-35.15 -2.0 -9.2 -3.5 -3.0 -17.75
Total Due Your automatic payment will pro Please do not mail a payment. Payments and Credits Payment Received, Thank you! Subtotal Auto Pay Credit Credit - Lifeline Credit (USAC) Credit - Lifeline Credit (Global) Credit - S3 off indefinitely Subtotal Recurring Charges Recurring Charges for:Number: Description Advantage Lifeline - 3423 - AB Call Waiting Caller ID Long Distance Provision Item - 100 Mins (1+)	6/29/17 7/19/17 7/19/17 7/19/17 7/19/17 7/19/17 7/19/17	-35.15 -2.0 -9.2 -3.8 -3.0 -17.75 to 8/18/17 to 8/18/17 to 8/18/17

FL 911 Surcharge

Network Recovery Fee

Subscriber Line Charge

FL Communications Services Tax

FL Telecom Relay System Fund

Local Communications Svc. Tax

	Cus	tomer Name	Account No.	ivoice Date	Page No.	
				06/29/17	2	

 continued	from	nrevious	nage	_

Total Taxes and Surcharges 14.45



EXHIBIT B

SAMPLE AD



www.RealHomePhone.com



IMPORTANT LIFELINE WIRELINE SERVICE INFORMATION:

Liletine is a government assistance program. **Only one Litetine service is available per household.** A violation of the one-per-household limitation constitutes a violation of the federal Communication Commissions rutes and will result in your de-enrollment from the program. **Your household is not permitted to receive multiple Litetine** leasuit my out de-enforment norm per jourgle in Your insussement or stroip performent or receiver multiple compranies. This includes writine and writeless services. Litelline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. Litelline is a federal benefit. You may not transfer your benefit to any other person. You must activate your service. Litelline is a federal benefit. Willingly making alse statements to obtain the benefit can result in fines, imprisonment, de-enrollinent or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits. Eligible liteline subscribers are offered our lowest basic wireline plan of \$20.70 per month plus taxes & lees in the AT&T area only.

Bureau of Indian General Assistance; AK, CA, FL, KS, LA, MN, OK, RI, UT



EXHIBIT C
USF SUPPORT BY STATE

AL	1,633,653
AR	3,844,366
ΑZ	10,944,433
CA	345,007
CO	187,756
FL	51,975
GA	6,309,612
ΙA	869,989
KS	295
KY	149,563
LA	10,036,398
MA	1,429,954
MD	9,955,841
MI	9,422,461
MN	20,172
MO	5,166,421
MS	66,407
NC	705,226
NE	180,255
ОН	599,756
PA	6,528,301
PR	94,184
RI	33,717
SC	784,173
TN	28,731
TX	1,916,701
UT	28,153
WI	815,591
WV	574,160

EXHIBIT D

CORPORATE ORGANIZATION CHART

PUBLIC VERSION (CONFIDENTIAL IN ENTIRETY)

APPLICANT CERTIFICATION

State of **Georgia**County of **Gwinnett**

My name is <u>Edward Smith</u>, I am employed by **Global Connection Inc. of America d/b/a Stand Up Wireless**, located at **5555 Oakbrook Parkway**, **Suite 620**, **Norcross**, **Georgia 30093** as its <u>Chief Financial Officer</u>. I am an officer of the Company and am authorized to provide the following certifications on behalf of the Company. This certification is being given to support the wireline Eligible Telecommunications Carrier petition filed by my Company with the Florida Public Service Commission (Florida PSC).

Company hereby certifies the following:

- 1. Company will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers (ETC), and the Florida Lifeline Program.
- 2. Company will follow all FCC rules, FCC Orders, and regulations contained 111 the Telecommunications Act of 1996 regarding federal Universal Service Program.
- 3. Company agrees that the Florida PSC may revoke a carrier's ETC designation for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for the company to retain ETC designation.
- 4. Company understands that if its petition for ETC designation is found to be in the public interest and approved by the PSC, it is based upon the information provided to the PSC in its petition. If there is a future change of company ownership, the company understands that the new owners must file a petition with the PSC prior to offering or getting USF or Lifeline, prior to the change of ownership and also make a showing of public interest to maintain the ETC designation.
- 5. Company understands that it may only receive reimbursement from the Universal Service Administrative Company (USAC) for active customer access lines which are provided using its own facilities or a combination of its own facilities and access lines obtained as UNEs from another carrier. A company that only seeks designation for the Lifeline program that does not meet the facilities requirement, certifies that it has received forbearance from the FCC.
- 6. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers. Company agrees to maintain records to document compliance with all federal and state requirements governing the Lifeline program for as long as the consumer receives Lifeline service plus five years.

Docket No. 20170145-TX Data Request

- 7. Company understands that Lifeline certification forms must be signed by applicants confirming that they participate in a qualifying Lifeline-eligible program prior to that customer being enrolled in the Florida Lifeline program. If a Lifeline applicant uses income-based eligibility, the company will require documents showing proof of income before customer eligibility is granted.
- Company agrees that it will not file a request for any low-income reimbursement at USAC
 without having customer-signed Lifeline certification applications on file at its office
 supporting amounts requested on USAC's Form 497.
- Company agrees it will submit to the PSC a copy of Form 497s filed with USAC, and will
 make available supporting signed customer Lifeline certifications upon request to:

Florida Public Service Commission Office of Industry Development and Market Analysis 2540 Shumard Oak Drive Tallahassee, Florida 32399-0850

I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.

8/1/17

signature

Date

Edward Smith

Printed Name

Business Address:

5555 Oakbrook Parkway Suite 620 Norcross, Georgia 30093